

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Administration of the North American) CC Docket No. 92-237
Numbering Plan, Carrier Identification)
Codes (CICs))

REPLY COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION

The United States Telephone Association (USTA) respectfully submits its reply to comments filed December 8 in the above-referenced docket.

The commenting parties generally support the Commission's objective to make equal access capability universally available. However, as USTA and others pointed out in their comments, circumstances have not warranted the forced retirement and replacement of switching facilities which cannot be upgraded to provide equal access capability.¹ USTA noted that the average cost of a switch based on Rural Utilities Service data was \$329,000 for a switch serving from 300 to 599 lines. The costs increased based on the number of lines served and the features included. However, such price estimates did not include all of the costs which would be incurred to replace a switch. It is not economically feasible for small telephone companies to incur such costs in order to meet the Commission's objective without some assistance in assuring the recovery of those costs.

¹See, comments of NTCA and United Utilities.

Therefore, USTA recommended that the Commission permit 75 percent of the capital costs of the new switch to be included in the federal revenue requirement for telephone companies that participate in the NECA pools for a three year period.² This would ensure that telephone companies with the least ability to absorb the costs of the forced retirement and replacement of their switching facilities to comply with the Commission's objective have an opportunity to recover a reasonable amount of those costs.

USTA urges the Commission to adopt the limited equal access conversion program described above. The cost of such a program to access customers would be quite reasonable when spread across the entire pool. This program will ensure that equal access capability is available throughout the country without imposing severe economic hardships on small

²USTA is currently contacting a large number of its member companies to verify data contained in the Local Exchange Routing guide to identify non-equal access capable switches. The preliminary results of USTA's outreach effort indicate that many switches listed as "non equal access" in the guide have actually been converted. USTA will file the final results of this verification process shortly with the Commission.

telephone companies and their customers.³

Respectfully submitted.

UNITED STATES TELEPHONE ASSOCIATION

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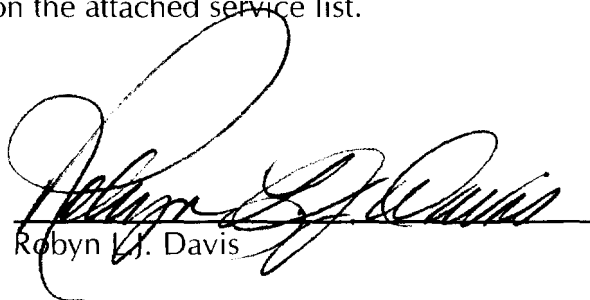
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January 12, 1998

³The Commission recognizes that switches with equal access capability still require expensive upgrades and, in some cases replacement, to provide four digit carrier identification codes and other advanced features. *See*, for example, Order, DA 97-2691, released December 24, 1997 and Order, DA 97-2717, released December 31, 1997.

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on January 12, 1998 Reply Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.



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